

BOARD OF TRUSTEES

CHAIRMAN

James A. Noyes

VICE CHAIRMAN

Charles Wilson
Southern California Edison

COUNTY SUPERVISORS

Hon. Marion Ashley
County of Riverside
Hon. Paul Biane
County of San Bernardino
Hon. Chris Norby
County of Orange
Hon. Don Knabe
County of Los Angeles
Hon. Ray Watson
County of Kern
Hon. Judy Mikels
County of Ventura
County of Imperial
County of San Diego

AGRICULTURE SECTOR

John W. Borchard, Jr.
Borchard Companies
Kathie Blyskal
Sunkist Growers, Inc.
Howard Frick
Kern County Farm Bureau
John Fricker
Riverside County Farm Bureau
Jeffrey Kent
Kent's Bromeliad Nursery, Inc..
Robert K. Seat
Orange County Farm Bureau
Geoffrey Vanden Heuvel
Milk Producers Council

BUSINESS SECTOR

Robert W. Bein
RBF Consulting
Les Clark
Independent Oil Producers Agency
John Donner
SBC
Brian J. Kelly
UNOCAL
Robert A. Krieger
Krieger & Stewart
Mike Phlaum
Rabobank, N.A.
Richard Thomson
Procter & Gamble Paper Products Co.
Stephen A. Zapotoczny
CP Kelco

CITY SECTOR

Hon. James Bond
City of Encinitas
Hon. Percy Byrd
City of Indian Wells
Hon. Frank Colonna
City of Long Beach
Hon. Gerald DuBois
City of Ontario
Ruben Duran
City of El Centro
Hon. Sandy Smith
City of San Buenaventura
Hon. Don Webb
City of Newport Beach

WATER SECTOR

Marilyn Dailey
San Diego County Water Authority
Col. John V. Foley
Moulton Niguel Water District
Ronald R. Gastelum
Andy Horne
Imperial Irrigation District
Donald Kendall
Calleguas Municipal Water District
Ann Mathews
Kern County Water Agency
John McFadden
Coachella Valley Water District
Metropolitan Water District
of Southern California
Angel Santiago
Inland Empire Utilities Agency

TASK FORCE CHAIRS

Richard Jemison
Land Strategies
Kenneth Petersen
Castaic Lake Water Agency
Stacy Roscoe
Dee Zinke
Calleguas Municipal Water District.

CHAIR EMERITUS

Hon. Harriett M. Wieder

EXECUTIVE DIRECTOR

Joan Anderson Dym

July 14, 2005

Mr. Lester Snow
Director
Department of Water Resources
P.O. Box 942836
Sacramento, California 94236-001

Re: California Water Plan: Public Review Draft March 2005

Dear Director Snow:

On behalf of the Southern California Water Committee, I am submitting the attached comments on the 2005 California Water Plan Update's (Plan) fourteen recommendations for the next twenty-five years.

The SCWC concurs with the Plan's conclusions that ensuring a sustainable and reliable water supply in 2030 will require integrated regional water management and an improved statewide water management systems. As you will note in our comments, the SCWC remains concerned, however, that the Plan does not identify specifically what the state is going to do this year, and in the next five years. What projects and programs is the state going to undertake and fund? What are the state's priorities?

At the same time that the SCWC encourages you to take a leadership role in identifying and defining projects that will ensure California's water future, we recognize the difficulty of developing public investment strategies. The SCWC urges you and Governor Schwarzenegger's administration to investigate all possible funding alternatives, including state bonds. We look forward to working with you on developing realistic funding strategies based on beneficiary pays principle that will guarantee sustainable water infrastructure funding.

The SCWC also urges the state to take a leadership role in developing all possible water resources, including surface storage, water conservation,, desalination, and reclamation. In our opinion, the Department of Water Resources should oppose any effort by groups that want to arbitrarily remove any water resource element from the California's water portfolio.

The 2005 California Water Plan Update is a more valuable document than former Water Plans and we compliment you and your staff for the enormous effort that this Plan reflects. The SCWC looks forward to a continuation of the Phased Work Plan, the development of more reliable analytical tools and data as part of future updates and to continuing our active participation in their planning.

Sincerely yours,
James A. Noyes
Chairman

Enclosure: Southern California Water Committee Comments: 2005 California Water Plan Update Recommendations



10184 Sixth Street ~ Suite C
Rancho Cucamonga, CA 91730
Phone (909) 980-4700
Fax (909) 980-2628

www.socalwater.org

California Water Plan Framework for Action Recommendations

Comments by the Southern California Water Committee

- 1. California needs to invest in reliable, high quality, sustainable and affordable water conservation, efficient water management, and development of water supplies to protect public health, and to maintain and improve California's economy, environment, and standard of living.**

California has had an historical role in water management, however the state needs to invest in high quality sustainable and affordable water, period. Conservation is just one water management tool to do so. The development of water supplies should be more than the protection of public health. California's economy and environment require reliable water supplies as well.

- 2. State government must provide incentives and assist regional and local agencies and governments and private utilities to prepare integrated resource and drought contingency plans on a watershed basis; to diversify their regional resource management strategies; and to empower them to implement their plans.**

The SCWC supports the concept of regional planning, but this recommendation does not specify what the state must do to assist regions in their planning, nor, how the state will provide incentives or assist regions.. What does it mean to "empower" regions to implement plans? Regions do not exist in isolation from each other. How will DWR integrate these plans? For example, droughts happen statewide. Regionalism should not mean that the state reduces or abdicates, in any way, its historic role in water management - the state role and regionalism should complement each other.

- 3. State government must lead an effort with local agencies and governments to inventory, evaluate, and propose management strategies to remediate the causes and effects of contaminants on surface and groundwater quality.**

The state already has a robust role in doing this through Regional Water Quality Control Boards. What purpose is served by a separate and distinct effort to identify and remediate contaminants? If the state needs an additional role it should be to ensure the use of good science and a cost/benefit analysis is done before any rules or regulations are adopted. More specifically the state should convene a blue ribbon commission to review interactions between the State and Regional Water Quality Control Boards to ensure remediation actions are done timely and effectively. DWR should chair meetings, in a public setting, with heads of the State and Regional Water Resources Control Board, Department of Health Services, to review progress associated with contamination issues.

4. California needs to rehabilitate and maintain its aging water infrastructure, especially drinking water and sewage treatment facilities, operated by State, federal and local entities.

The state should lead in this effort. This recommendation is too weak. The state should be strong advocates for federal funds and consider partnering with local entities. For example, working with the State Water Project contractors and transferring certain portions of the system to the contractors to operate and maintain would achieve better efficiencies and be in the best interest of the public and the environment. The state also needs to financially invest in expanding the state water system to make it more efficient and to complement local investments. The state should develop a comprehensive finance plan employing various mechanisms, not new user fees or general taxes.

5. State government must continue to provide leadership for the CALFED Bay-Delta Program to ensure continued and balanced progress on greater water supply reliability, water quality ecosystem restoration and levee system integrity.

This recommendation neglects to mention one of key program elements of CALFED, surface storage. The state also has a role in providing realistic funding solutions and funding for CALFED programs, and to construct those projects with public benefits that are deemed feasible and have identified beneficiaries with viable financing options.

6. State government needs to take the lead in water planning and management activities that: (a) regions cannot accomplish on their own, (b) the State can do more efficiently, (c) involve inter-regional, inter-state, or international issues, or (d) have broad public benefits.

How will the state accomplish this? What are the state's priorities? We question whether or not California should have any role in water planning internationally.

7. California needs to define and articulate the respective roles, authorities, and responsibilities of State, federal, and local agencies and governments responsible for water.

Has the state not already done this? Is it the state's role to define the role of local agencies and governments? Most agencies' roles, authorities and responsibilities are created by state for federal statute. This recommendation should instead be to minimize or clarify conflicting roles where they exist. For example, the state should advocate for implementing actions of the 2003 California Recycled Water Task Force by working to remove regulatory constraints that impede recycling projects.

8. California needs to develop broad and realistic funding strategies that define the role of public investments for water and other water-related resource needs over the next quarter century.

Water user contributions need to be linked to actual beneficiaries including environment, power, recreation, etc. Financial investments must include regulatory assurances.

9. State government should invest in research and development to help local agencies and governments implement promising water technologies more cost effectively.

There are a number of organizations, including the federal government and academia that are studying the same things. With limited state funds, should the state even enter into “research and development” projects? If so, then the state should only invest in helping to fund emerging technologies that can provide broad statewide benefits.

10. State government should help predict and prepare for the effects of global climate change on our water resources and water management systems.

Is this a role for state government? Climate changes affect the entire planet. The state should encourage the federal government to fund research on the impacts and effects of global climate changes. A better role for the state is to determine what changes to the state’s water management systems will be necessary in order to maintain at least current levels of supply and flexibility under climate change scenarios and develop a plan to implement such changes. However, as a cautionary note, while we agree that global climate changes are occurring, there are disagreements among climate change experts as to the consequences. As such, a note of caution should be taken by state and local agencies before large amounts of dollars are spent on implementation actions.

11. DWR and other State agencies should improve data, analytical tools, and information management needed to prepare, evaluate, and implement regional integrated resource plans and programs in cooperation with other federal, tribal, local, and research entities.

DWR should improve data, analytical tools, and information management in order to provide robust and accurate information to support regional plans.

12. DWR and other State agencies should explicitly consider public trust values in the planning and allocation of water resources and protect public trust uses whenever feasible.

It is current state policy to “explicitly consider public trust values”. This recommendation seems superfluous.

13. DWR and other State agencies should invite, encourage, and assist tribal government representatives to participate in statewide, regional, and local water planning processes and to access State funding for water projects.

Involvement of tribes in statewide, regional, and local planning processes and access to state funding is an administrative matter, not a water planning matter. Does recommendation intent to give tribes priority in funding?

14. DWR and other State agencies should encourage and assist representatives from disadvantaged communities and vulnerable populations, and the local agencies and private utilities serving them, to participate in statewide, regional, and local water planning processes and to get equal access to State funding for water projects.

What is meant by equal access?

GENERAL COMMENTS

Speaking colloquially, the California Water Plan is a “motherhood and apple pie” document. How will this Plan make a difference to California’s water future? Granted that there have been improvements made to the current Plan, it still remains just a “plan”. It is a plan with no action steps identified. It does not commit the state to anything.

A strategic plan is a document that describes the use of strategy in planning the course of future business operations. In this context, the California plan for water resources should identify specifically what the state is going to do this year, and in the next five years. What projects and programs is the state going to undertake and fund? What are the state’s priorities? What actions are planned to eliminate the 2 million acre-feet of groundwater overdraft? California needs a statewide Integrated Resource Management Plan.

Is California going to do more than just study Delta levee failure? Is there an action plan to reduce the vulnerability of the Delta? What is the state doing about facilitating desalination projects, recycling projects? The state needs to take the lead in convening the Department of Health Services and the State and Regional Water Quality Control Boards to clarify and articulate state policy regarding the use of recycled water and desalination as part of our water supply. Currently conflicting signals from agency to agency make it difficult to implement projects.

The state needs to take a leadership role in identifying and defining projects that ensures California has an enviable economy, and quality of life.